

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY'S MARKET PARENT COMPANY,
LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-10166 (JTD)

(Jointly Administered)

Re: Docket No. 63

**NOTICE OF FILING OF REVISED PROPOSED ORDER (I) APPROVING THE SALE
OF CERTAIN OF THE DEBTORS' ASSETS FREE AND CLEAR OF ALL LIENS,
CLAIMS, ENCUMBRANCES, AND INTERESTS, (II) AUTHORIZING THE
ASSUMPTION AND ASSIGNMENT OF CONTRACTS AND LEASES,
AND (III) GRANTING RELATED RELIEF (PUBLIX SUPER MARKETS, INC.)**

PLEASE TAKE NOTICE that on January 30, 2020, the above-captioned debtors and debtors in possession (the “**Debtors**”) filed the *Motion of Debtors for Entry of (I) an Order (A) Approving Bid Procedures in Connection with the Potential Sale of Certain of the Debtors' Assets, (B) Scheduling an Auction and a Sale Hearing, (C) Approving the Form and Manner of Notice Thereof, (D) Authorizing the Debtors to Enter into the Stalking Horse Agreement, (E) Approving Bid Protections, (F) Approving Procedures for the Assumption and Assignment of Contracts and Leases, and (G) Granting Related Relief; and (II) an Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Contracts, and (C) Granting Related Relief (Publix Super Markets, Inc.)* [Docket No. 63] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are Lucky's Market Parent Company, LLC (2055), Lucky's Farmers Market Holding Company, LLC (5480), Lucky's Market Operating Company, LLC (7064), LFM Stores LLC (3114), Lucky's Farmers Market, LP (0828), Lucky's Farmers Market Resource Center, LLC (7711), Lucky's Market Holding Company 2, LLC (0607), Lucky's Market GP 2, LLC (9335), Lucky's Market 2, LP (8384), Lucky's Market of Longmont, LLC (9789), Lucky's Farmers Market of Billings, LLC (8088), Lucky's Farmers Markets of Columbus, LLC (3379), Lucky's Farmers Market of Rock Hill, LLC (3386), LFM Jackson, LLC (8300), Lucky's Farmers Market of Ann Arbor, LLC (4067), Lucky's Market of Gainesville, LLC (7877), Lucky's Market of Bloomington, LLC (3944), Lucky's Market of Plantation, LLC (4356), Lucky's Market of Savannah, GA, LLC (1097), Lucky's Market of Traverse, City, LLC (2033), Lucky's Market of Naples, FL, LLC (8700), Sinoc, Inc. (0723), Lucky's Farmers Market of Ellisville, LLC (2875), and Lucky's Farmers Market of Lexington, KY, LLC (3446).

PLEASE TAKE FURTHER NOTICE that the deadline to object to the Motion was March 24, 2020 at 4:00 p.m. The Debtors received comments to the Motion from Scott Randolph, Orange County, Florida Tax Collector, Benderson Development Company, LLC, DDRTC Cypress Trace LLC, Regency Centers, L.P., Site Centers, Corp., TLM Realty Corp., Samson Merger Sub, LLC, U.S. Bank, and the Office of the United States Trustee (collectively, the “**Responding Parties**”).

PLEASE TAKE FURTHER NOTICE that the Debtors, in consultation with the Responding Parties, have revised the proposed form of order approving the Motion (the “**Order**”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is a copy of the Order that the Debtors will seek to have entered, subject to revisions at or before the hearing scheduled for March 30, 2020 at 1:00 p.m. (ET). For the convenience of the Court and other interested parties, a blackline comparison of the Order against the proposed order filed with the Motion is attached hereto as Exhibit B.

Dated: March 29, 2020
Wilmington, Delaware

Respectfully submitted,

POLSINELLI PC

/s/ Brenna A. Dolphin

Christopher A. Ward (Del. Bar No. 3877)

Brenna A. Dolphin (Del. Bar No. 5604)

222 Delaware Avenue, Suite 1101

Wilmington, Delaware 19801

Telephone: (302) 252-0920

Facsimile: (302) 252-0921

cward@polsinelli.com

bdolphin@polsinelli.com

-and-

Liz Boydston (Admitted *Pro Hac Vice*)

2950 N. Harwood, Suite 2100

Dallas, Texas 75201

Telephone: (214) 661-5557

lboydston@polsinelli.com

*Counsel to the Debtors and
Debtors in Possession*